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**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH  
CENTRAL DIVISION**

**IN RE:**

**CASE: 17-30714**

THANE JOSEPH BRERETON, JR.  
STEPHANIE J BRERETON

**CHAPTER 13**

**Debtors**

**Hon. R. KIMBALL MOSIER**

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**TRUSTEE'S CONTINUING OBJECTION TO CONFIRMATION**

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The Standing Chapter 13 Trustee, hereby objects to confirmation based on the following unresolved issues:

1. The following creditor objection(s) remain unresolved: HLS of Nevada, LLC.
2. The Debtors have proposed in the plan that "Any allowed secured claim filed by a taxing authority not otherwise provided for by this plan shall be paid in full as part of Class 4 as set forth in Local Rule 2082-2(e)..." The Debtors must establish that it is proper to pay any allowed secured claim filed by a taxing authority with Class 4: Other administrative expenses allowed under § 507(a)(2).
3. The Debtors' Exhibit attachment to the Plan does not list the correct amount on Lines b, e, and f.

**Restatement of Issues from Prior Objection(s):**

1. The Debtors failed to produce at the 341 Meeting statements from financial account(s) for the period that covers the petition date for Cyprus Credit Union (see Fed. R. Bankr. P. 4002(b)(2)(B)).
2. It appears the Debtors have filed a plan that fails to provide for tax years of 2017 – 2019 to be paid into the Plan.
3. The Plan fails to include a required non-standard provision in Part 8.1, specifically an exact applicable commitment period, see Local Rule 2083-2(f)(2).
4. The Debtor has failed to include in paragraph 8.1 of the plan the creditor(s) who will receive Adequate Protection Payments and the corresponding part of the plan in which such creditor(s) is listed. Further, it does not refer creditor(s) to the Notice for Adequate Protection Payments.
5. The Chapter 13 plan does not comply with §§ 1322(b) and 1325(a)(5) in that it does not provide for the following secured claims: Utah State Tax Commission.

THEREFORE, the Trustee has an ongoing objection to the confirmation.

Dated: February 15, 2018

LAJ /S/  
LON A. JENKINS  
CHAPTER 13 TRUSTEE

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Continuing Objection to Confirmation was served upon all persons entitled to receive notice in this case via ECF Notification or by U.S. Mail to the following parties on February 15, 2018:

JUSTIN M. MYERS, ECF Notification

/s/ Shaylyn Lins